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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FREMICHAEL GHEBREYESUS,
individually and as Trustee of the Estate of
Ghebreyesus Ghebrelul Fremichael; and
SIMRET ZERAI YOHANNES (A/K/A
SEMRET ZEREYOHANS KELEB),

Plaintiffs,

vs.

THE FEDERAL DEMOCRATIC REPUBLIC
OF ETHIOPIA, THE MINISTRY OF
FOREIGN AFFAIRS OF ETHIOPIA, THE
CITY OF ADDIS ABABA, THE SUB-CITY
OF BOLE, ADDIS ABABA, FEDERAL
FIRST INSTANCE COURT OF ETHIOPIA,
BROOK BEKELE BESHAH (A/K/A BIRUK
BEKELE BESHAH; A/K/A BIRUK
BEKELE; A/K/A BROOK BEKELE),

Defendants.

Case No.: 2:22-cv-01717-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

Under Local Rules IA 6-1, 7-1, and 26-3, Plaintiffs Fremichael Ghebreyesus, individually and as Trustee of the Estate of Ghebreyesus Ghebrelul Fremichael, and Simret Zerai Yohannes (“Plaintiffs”) and Defendant Brook Bekele Beshah (“Bekele”), stipulate, agree, and respectfully request that the Court extend all discovery deadlines in the Scheduling Order entered by this Court on December 12, 2022 [ECF. No. 58]. This is the Parties’ first request to extend all discovery deadlines.

I. Statement Specifying the Discovery Completed.

1. Plaintiffs served their initial disclosures on May 25, 2023.
2. Bekele served his initial disclosures on May 25, 2023.
3. Plaintiffs served their First Set of Requests for Production of Documents on Bekele on June 15, 2023. Bekele served his responses on July 28, 2023.
4. Bekele served his first supplement to initial disclosures on July 28, 2023.
5. Bekele served his First Set of Interrogatories, First Set of Requests for Admissions, and First Set of Requests for Production of Documents on Plaintiffs on November 16, 2023. Plaintiffs served their responses on January 18, 2024.
6. Bekele served his second supplement to initial disclosures on December 13, 2023.
7. Bekele served his Second Set of Requests for Production of Documents on Plaintiffs on January 24, 2024. Plaintiffs served their responses on February 26, 2024.
8. Plaintiffs served their first supplement to initial disclosures on February 5, 2024.
9. Bekele served his third supplement to initial disclosures on February 7, 2024.
10. Bekele served his fourth supplement to initial disclosures on February 9, 2024.

II. A Specific Description Of The Discovery That Remains To Be Completed.

11. The Parties anticipate conducting further fact discovery in this case, including serving written discovery requests, taking party and non-party depositions, taking expert depositions if experts are disclosed in this case, and possibly issuing subpoenas to third parties.

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III. The Reasons Why The Deadline Was Not Satisfied Or The Remaining Discovery Was Not Completed Within The Time Limits Set By The Discovery Plan.

12. Good cause exists to extend the discovery deadlines because this case involves fact-intensive claims that involve decades' worth of conduct, much of which occurred outside of the United States. In addition to the logistical issues obtaining documents from outside the United States, many of the documents produced to date have required translation, which has increased the time required to review and produce materials.

13. Moreover, this case involves witnesses located outside the United States and who are not United States citizens. Given the difficulty in serving foreign witnesses, the parties have been working cooperatively to voluntarily secure at least one requested deposition, and may need similar time to secure voluntary or compelled testimony from other witnesses outside the United States.

14. Furthermore, the parties have been meeting and conferring over the past months regarding written discovery responses and production issues. Conversations remain ongoing in hopes the parties can reach a negotiated solution without court intervention, but require additional time to determine whether such solution can be reached or whether motion to compel practice will be necessary.

15. The Parties have been diligent and cooperative in conducting discovery thus far, but it has become clear that additional time is needed to complete discovery. The extension of the discovery deadlines is not sought for purposes of delay and will not result in prejudice to the Parties.

IV. Proposed Schedule For Completing All Remaining Discovery.

<u>Deadline</u>	<u>Current Date</u>	<u>Proposed New Date</u>
Discovery Cut-off	May 10, 2024	July 9, 2024
Motions to Amend Pleadings	May 24, 2024	July 23, 2024
Expert Disclosures	March 11, 2024	May 10, 2024
Rebuttal Expert Disclosures	April 10, 2024	June 7, 2024

Dispositive Motions	July 9, 2024	September 6, 2024
Pretrial Order	August 8, 2024	October 7, 2024

IT IS SO STIPULATED.

DATED: March 8, 2024

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By: /s/ Kiley A. Harrison

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DATED: March 8, 2024

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*Attorneys for Defendant Brook Bekele Beshah***IT IS SO ORDERED:**


 UNITED STATES MAGISTRATE JUDGE

DATED: April 15, 2024